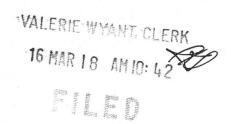
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IN THE SUPERIOR COURT OF THE STATE OF ARIZONA IN AND FOR THE COUNTY OF COCONINO

STATE OF ARIZONA,
Plaintiff,
No. CR2015-00862

vs. STEVEN EDWARD JONES,

Defendant.

PRETRIAL MEMORANDUM

Hon. Dan Slayton - Div. 2

COMES NOW the State of Arizona, by and through the undersigned deputies, and submits the following proposed Pretrial Memorandum. The State made a good faith effort to establish a joint pretrial memorandum with defense counsel by the Court's established deadline of March 19, 2016; however, the parties have been unable to reach an agreement on proposed deadlines. Defense counsel declined to consider the State's proposed deadlines via email and rejected the State's requests to speak via telephone. Therefore, the State now offers its proposed Pretrial Memorandum independent of defense counsel.

1. Length of Trial:

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The State anticipates trial will last approximately 5 weeks. The State's case-in-chief is anticipated to last approximately 4 weeks.

2. Aggravation/Mitigation: The State intends to seek the maximum aggravated term(s) following any conviction at trial, including a conviction on any lesser-included offense. The State's Notice of Aggravating Factors is forthcoming.

3. Disclosure Issues:

The State's disclosure is substantially complete. The State is still awaiting forensic reports for serology and DNA. As of this filing, serology on some of the items has been completed. The DPS lab is aware of the serious nature of the case and has indicated a willingness to expedite the testing as much as possible. However, the DNA testing is not expected to be completed for another 6 weeks. The State is also awaiting a report from Tom Bevel.

- **4.** Jury Questionnaire: The State proposes to use a jury questionnaire in this case. The State also proposes to have potential jurors fill out the questionnaire one week prior to jury selection to give the parties an opportunity to review the questionnaires.
- 5. Proposed Schedule: The State believes a scheduling order, along the following deadlines, would be appropriate in this case:
 - a. Notice of any Defense Expert(s): 6/1/2016
 - b. Completion of Defense and State Expert Reports: 8/1/2016
 - c. Notice of any Rebuttal Experts: 9/1/2016
 - d. Final notice of Defense non-expert witnesses: 9/1/2016
 - e. State's Romero witness list: 9/1/2016
 - f. Rebuttal Expert Reports: 10/1/2016
 - g. Completion of interviews: 11/1/2016
 - h. Substantive Motions due (not simple motions in limine): 11/29/2016
 - Proposed Jury Questionnaire due: 11/29/2016

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day of March, 2016.

^{*} Defense counsel has indicated they have a scheduling conflict with a February 7, 2017 trial date, and have instead proposed a trial date of March 20, 2017. The State has no objection to setting a March 20, 2017 trial date.